

CHAPTER 8

TRAINING

A. **INTRODUCTION.** To ensure an efficient process for investigating and reporting on potential and actual violations of the Antideficiency Act, an effective training program is essential for those individuals involved in the investigation process.

B. **AVAILABILITY OF TRAINING COURSES.** The most important individual involved in the Antideficiency Act violation process is the investigator. Accordingly, the Defense Business Management University shall ensure that training courses are available for those personnel who may be selected, in the future, to investigate a potential violation of the Antideficiency Act. Those courses shall be included in the Financial Management curriculum of the Department's education and training program.

1. The focus of the training course shall be on the duties and responsibilities of an investigating officer. The courses shall include extensive training on such aspects of a proper investigation as interviewing witnesses, gathering evidence, developing the "facts," documenting the findings and recommendations, preparing the report of investigation, recommending discipline, meeting the timeframes of the investigation, recommending corrective actions, concentrating on lessons learned from prior investigations, and maintaining independence throughout the investigation.

2. Temporary duty costs for attendance at the resident courses shall be funded by the DoD Component nominating each student. In addition, the course curriculum should be available on video tape, or similar media, supplemented by workbooks. DoD Components may request these tapes and workbooks from the Defense Business Management University. The tapes or other media are to be used as supplemental training devices and not as a substitute for formal training.

3. The DoD Components shall nominate a number of civilian and military personnel to attend a training course for investigating officers based upon the DoD Components' projected needs for investigating officers. Such individuals need not be from a financial management functional area, but should otherwise be qualified to serve--except for the lack of appropriate training--as an investigating officer of a potential violation of the Antideficiency Act. The total nominations shall be based on the size of the DoD Component; number of major commands, or equivalent; and the average number of investigation cases experienced by the DoD Component. A DoD Component should nominate a least one candidate per projected investigation per year. When selecting military nominees, consideration should be given to the numbers of members needed for each rank since it is desirable, but not mandatory, that investigators should be equal to, or greater than, the highest ranking individual being investigated.

4. Upon completion of the course, each graduate will receive a certificate, signed by the school director, with an expiration date of 5 years after completion of the training. Graduates are

encouraged to renew their certificates every 5 years by attending a refresher training course for investigators established by the Defense Business Management University or using a hands-on or computer course discussed in sections C and D, below.

5. Graduates of the investigation training course with current certificates shall be included on a roster maintained by each DoD Component. Data to be maintained on the roster for each graduate include the date initial training was received, rank/grade, organization to which he/she is assigned, functional specialty(ies), and number of investigations previously conducted. Controls shall be established to ensure that the required roster is kept current. The roster shall be used by each major command or DoD Component to select individuals to investigate potential violations of the Antideficiency Act.

C. **HANDS-ON TRAINING COURSES.** As an alternative, DoD Components may develop a “hands-on” course for individuals eligible to be selected as investigating officers. The requirements for the focus of the course shall be the same as those discussed in subsection B.1., above. The course shall be approved by the Director, Defense Business Management University, and the Under Secretary of Defense (Comptroller). The supervisor of an individual who completes a “hands-on” course for either initial or refresher training shall issue a certificate of completion annotated with the appropriate 5-year expiration date. The names of individuals completing the course shall be included on the roster as discussed in subsection B.5., above.

D. **REFRESHER TRAINING COURSES.** DoD Components are encouraged to develop video or computer courses to be used either as refresher training or as a “hands-on” guide during an investigation. The course shall be approved by the Director, Defense Business Management University, and the Under Secretary of Defense (Comptroller).

E. **TRAINING FOR FINANCIAL AND PROGRAM MANAGERS.** DoD Components shall provide training, on a periodic basis, for senior financial managers and program managers. Video or computer courses similar to those discussed in section D, above, could be used for these officials. The focus of the training should include the basics of fund control and the Antideficiency Act statute; the types of violations that can occur; the most frequent types of violations that occur in the Department of Defense and their causes; the requisite training, supervision, and oversight of personnel who perform financial management or programmatic functions; and methods for preventing violations.